

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESale PRICE  
LITIGATION

THIS DOCUMENT RELATES TO ALL  
ACTIONS.

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs, by their attorneys, respectfully move this Court for leave to file Exhibit C to their Motion For Leave To Set Aside The Ten Deposition Limit With Respect To Defendant AstraZeneca under seal.

1. Pursuant to Paragraph 14 of the Protective Order (Dec. 13, 2002), the parties may designate documents or deposition testimony as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL."

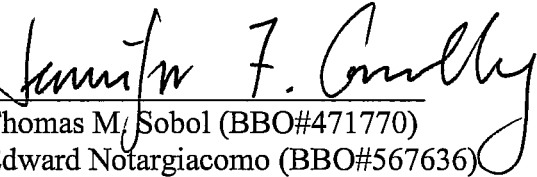
2. Exhibit C to plaintiffs' motion is an organizational chart produced by AstraZeneca for the Managed Markets Business Group (AZ0587840-854 – HIGHLY CONFIDENTIAL).

3. Because of defendant's designation of the organizational chart as HIGHLY CONFIDENTIAL under the Protective Order, plaintiffs respectfully request leave to file Exhibit C to plaintiffs' motion under seal (and have done so contemporaneously with the filing of this Motion).

WHEREFORE plaintiffs respectfully request that this Court grant them leave to file Exhibit C to their Motion For Leave To Set Aside The Ten Deposition Limit With Respect To Defendant AstraZeneca under seal, and all other relief that this Court deems just and proper.

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DATED: July 6, 2005

By 

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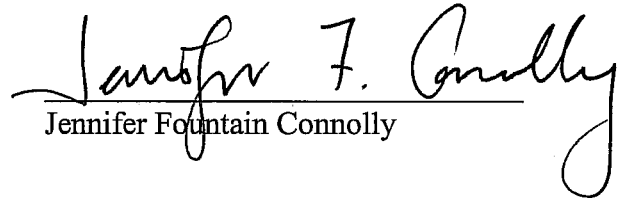
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**CERTIFICATE OF SERVICE BY VERILAW**

Docket No. MDL 1456

I, Jennifer Fountain Connolly, hereby certify that I am one of plaintiffs' attorneys and that, on July 6, 2005, I caused copies of Plaintiffs' Motion for Leave to File Under Seal to be served on all counsel of record by causing same to be posted electronically via Verilaw.

  
Jennifer Fountain Connolly